



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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ATTORNEY GENERAL

DIVISION OF SOCIAL JUSTICE
CIVIL RIGHTS BUREAU

March 5, 2023

BY ECF

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

Re: *In re: New York City Policing During Summer 2020 Demonstrations,*
No. 20-CV-8924 (CM) (GWG)
This Letter Relates to All Cases

Dear Judge Gorenstein:

We write on behalf of the non-stayed Plaintiffs in these consolidated cases to provide updated deposition charts the Court requested in its Order, ECF No. 887, current as of today. Exs. A (Depositions Taken to Date); B (Depositions to be Taken).

Plaintiffs note that Defendants' charts incorrectly identify the depositions of Officer Giovanni Fierro, Officer Michael Kovalik, and Deputy Inspector Robert O'Hare as disputed though Defendants did not dispute them in their original letter. *See* ECF Nos. 841, 877-2, 895-2.¹ Indeed, Officer Kovalik's deposition has already been taken and any objection to that deposition is moot. Accordingly, these erroneous designations should be ignored.

We thank the Court for its continued attention to this matter.

Respectfully submitted,

s/ Lillian M. Marquez

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CC: All counsel of record

¹ These charts do not reflect depositions taken since February 18, or the withdrawal of the notice for Kathleen O'Reilly.